

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

Amendment of Parts 1, 21, 73, 74 and 101 of )  
the Commission's Rules to Facilitate the )  
Provision of Fixed and Mobile Broadband ) WT Docket No.  
03-66  
Access, Educational and Other Advanced ) RM-10586  
Services in the 2150-2162 and 2500-2690 )  
MHz Bands )

**COMMENTS IN SUPPORT OF PETITION FOR RECONSIDERATION**

NTELOS Inc. hereby submits these comments in support of the Petition for Reconsideration filed in this docket on April 7, 2003 by the Wireless Communications Association International, Inc. ("WCA").

NTELOS Inc., through its affiliates and subsidiaries (collectively "NTELOS"), is a full service telecommunications provider of wireless and wireline services in Virginia and West Virginia. NTELOS holds the Virginia MDS Basic Trading Area authorizations for Charlottesville (B075), Richmond-Petersburg (B374), Roanoke (B376), Staunton-Waynesboro (B430), and Winchester (B479). In addition, it holds licenses for approximately 35 individual MDS stations and leases capacity on another 49 MDS and ITFS facilities

For the past two years, NTELOS has been pursuing a new wireless technology that will allow us to bring broadband services to rural areas. We have selected a 2<sup>nd</sup> generation technology that we are now testing in Charlottesville, Virginia. NTELOS currently has two, 2-way second generation technology applications before the Commission. But more importantly for the purposes of these comments, we have eight more 2-way site applications undergoing engineering and development for 2003.

If the freeze is maintained, NTELOS could not file these applications during the pendency of this proceeding. NTELOS appreciates the complexity of the rules change process as well as the amount of time and effort the staff must devote to a comprehensive change like the one proposed in this docket. But we are concerned that we will lose momentum if our applications are delayed until the proceeding is complete.

For NTELOS, it is particularly important that our wireless broadband efforts proceed promptly. In our competitive local exchange operations, NTELOS serves a number of our DSL customers via line-sharing arrangements obtained from the incumbent local exchange carrier. But as a result of the FCC's recent decision on the network unbundling obligations, it appears that line sharing will not be available long term as a means to deliver competitive broadband. This development has given new urgency to our wireless broadband efforts.

Because of the importance of this technology in bringing broadband to rural areas, as well as its potential as a competitive alternative to DSL and cable modems, NTELOS urges the Commission to grant WCA's petition.

Respectfully submitted,

By: /s/ Mary McDermott  
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Filed: April 17, 2003

## **CERTIFICATE OF SERVICE**

I, Mary McDermott, hereby certify that a copy of the foregoing Comments in Support of Petition for Reconsideration has been served by First Class Mail, postage prepaid, this 17<sup>th</sup> day of April, 2003, on each of the following:

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